

USDA PRIVACY IMPACT ASSESSMENT FORM

Project Name:

Plants Distribution Update (Plants DU) – an application in the Natural Resource Information, Inventory, and Assessment IT Investment.

Description of Your Program/Project:

The mission of the Natural Resources Conservation Service (NRCS) is to provide leadership in a partnership effort to help people conserve, maintain, and improve the nation's natural resources and environment. NRCS assists owners of America's private land with conserving their soil, water, and other natural resources. NRCS delivers technical assistance based on sound science and suited to a customer's specific needs.

The Plant DU IT business applications support the conservation planning core mission of NRCS. The Plant DU includes business applications that provide support for development and delivery of conservation programs, analyzing and reporting progress, and management applications.

The nature of the NRCS operational environment is a widely distributed operational environment – NRCS provided services in over 3000 offices throughout the US, Caribbean a Pacific Basin – and the complexity of managing natural resource information creates expensive and challenging problems for IT. Unlike more traditional business sectors such as banking or marketing, many of the natural resource business processes have never been automated. The science is often complex and is not well understood. There are considerable differences in the implementation of similar business processes for state to state and office to office. There are few commercially available automated business applications. Application development involves integration of underlying COTS framework software and extensive customization.

The 2002 Farm Bill is changing the way NRCS IT products are developed, managed, delivered, and consumed. In the past the primary users of IT were NRCS employees and to a limited extend conservation districts. The Farm Bill authorized USDA to use Technical Service Providers (TSPs). This authorization is creating a new industry of certified professionals (TSPs) from the private sector, non-profit organizations, and public agencies to provide direct technical assistance and deliver conservation services authorized in the \$3.0 billion in conservation assistance. Technical assistance includes conservation planning and design, layout, installation, and evaluation of approved conservation practices. To be successful and meet the increased demand for providing technical assistance, TSPs like NRCS field offices, will need access to NRCS data and automated conservation planning tools. They will use geospatial technologies like Geographic Information Systems (GIS) and Global Positioning Systems (GPS) to gain efficiencies in planning and installing conservation practices.

DATA IN THE SYSTEM

1. Generally describe the information to be used in the system in each of the following categories: Customer, Employee, and Other.	<p>Customer: As an individual reporter for the Plants DU, customers provide information regarding the identification and location of various types of flora throughout the US.</p> <p>Employee: No employee information is entered into or stored within the database. Specific employees from the NRCS National Plant Data Center (NPDC) may access customer data to contact the individual to verify the veracity of the claim or to request additional information of the sighting.</p> <p>Other: There is an area within the web forms that allows a user (i.e. customer) to input personal data of a third person who may be used as an additional reference for verifying the sighting.</p> <p>There is a button where an individual can allow his/her name as the identifier to be published on the NRCS Public Web Site.</p>
2a. What are the sources of the information in the system?	Customer data is provided to the system through screen data entry on the public website. This is not controlled or verified by the application.
2b. What USDA files and databases are used? What is the source agency?	None. Data is entered by the general public.
2c. What Federal Agencies are providing data for use in the system?	None
2d. What State and Local Agencies are providing data for use in the system?	None
2e. From what other third party sources will data be collected?	All data is entered by third party sources.
2f. What information will be collected from the customer/employee?	<p>Customer: Required contact information for the individual reporter includes: <i>First/Last Name, Telephone number, Email address, State.</i></p> <p>Optional information includes: <i>Address, City, Zip code.</i></p> <p>Employee: No employee information is entered or stored.</p> <p>Other: There is a field which asks for an additional identifier (3rd party verifier) which asks for, but is not mandatory to provide, the same information as the individual reporter.</p>
3a. How will data collected from sources other than the USDA records and the customer be verified for accuracy?	No check for accuracy is conducted
3b. How will data be checked for completeness?	Required fields are verified for completion, but are not verified for accuracy of the contained information.

ACCESS TO THE DATA

1. Who will have access to the data in the system (Users, Managers, System Administrators, Developers, Other)?	<p>If an individual allows his information to be published on the public website, then he/she allows all viewers/users of the site to see his/her information.</p> <p>If the individual does NOT accept the information to be published on the website, then the only persons who have access to the identifier's personal data are specific individuals within the NRCS NPDC employees.</p>
2. How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?	<p>The only access a user has to the data is through the public web site. This access is ONLY through the individual user's logon ID and password and is only for the individual user. Users can not see, modify or interact in any way with other user data.</p>
3. Will users have access to all data on the system or will the user's access be restricted? Explain.	<p>Customer data is restricted by their choice to make their information available to the web site. Some NRCS NPDC employees have access to customer contact data for business purposes.</p>
4. What controls are in place to prevent the misuse (e.g. browsing, unauthorized use) of data by those having access?	<p>User names and passwords are in place for customers entering data.</p> <p>Some NRCS NPDC employees have access to customer contact data, but this access is restricted to specific individuals.</p>
5a. Do other systems share data or have access to data in this system? If yes, explain.	No
5b. Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface.	Privacy and accessibility rules are identified and specified by the Agency management system owners.
6a. Will other agencies share data or have access to data in this system (International, Federal, State, Local, Other)?	None
6b. How will the data be used by the agency?	NA
6c. Who is responsible for assuring proper use of the data?	NA

ATTRIBUTES OF THE DATA

1. Is the use of the data both relevant and necessary to the purpose for which the system is being designed?	Yes. Without customer interaction, the Plant DU would not be able to function.
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2a. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected?	No, all data collection is known to the customer.
2b. Will the new data be placed in the individual's record (customer or employee)?	NA
2c. Can the system make determinations about customers or employees that would not be possible without the new data?	NA
2d. How will the new data be verified for relevance and accuracy?	NA
3a. If data is being consolidated, what controls are in place to protect the data from unauthorized access or use?	NA
3b. If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain.	NA
4a. How will the data be retrieved? Can it be retrieved by personal identifier? If yes, explain.	Data on the public website can, and is, used by anyone accessing the site. This could include names of identifiers who have chosen to publish their contact information. Individuals who choose not to publish their contact information publicly can not be identified to the general public.
4b. What are the potential effects on the due process rights of customers and employees of: <ul style="list-style-type: none"> consolidation and linkage of files and systems; derivation of data accelerated information processing and decision making; use of new technologies. 	Customers and employees have due process rights regardless of the physical structure of a particular database.

MAINTENANCE OF ADMINISTRATIVE CONTROLS

1a. Explain how the system and its use will ensure equitable treatment of customers and employees.	The system is based on agency business processes. Any customer who can participate in this program, receives the same attention from the computer, and is processed under the same automated business rules as any other customer.
2a. If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?	The Plants DU website system is operated at a single site. The Plant DU has a publicly available website that is accessible by anyone with a connection to the internet. Procedures and process are in place to assure continuance of operations and to

	assure the integrity of the system.
2b. Explain any possibility of disparate treatment of individuals or groups.	There is nothing inherent to Plants DU that would allow any possibility of disparate treatment.
2c. What are the retention periods of data in this system?	Contracts entered in the system can have a life up to 30 years. Other files (including Owner, Operator and Producer (Volunteer/Employee)) range from 10 years retention to the 30 for contracts. The longevity of the system is not known, but data regularly outlives a particular processing system. Legal requirement for data retention are adhered to, as applicable.
2d. What are the procedures for eliminating the data at the end of the retention period? Where are the procedures documented?	Current system data has not reached the retention period specified. When this happens the usefulness of the data will be evaluated on a case-by-case basis to determine if it should be retained or not.
2e. While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?	Data relates to a particular business transaction between the government and the customer, or to a particular plan for implementing conservation on the ground. Business transactions are recorded and concluded, and remain as historic documentation of a completed event. It does not change further over time unless there is a subsequent business transaction conducted. Plans, by nature, evolve over time. Plan data is updated according to the business activities of the agency as specified in the NRCS General Manual.
3a. Is the system using technologies in ways that the USDA has not previously employed (e.g. Caller-ID)?	No
3b. How does the use of this technology affect customer/employee privacy?	NA
4a. Will this system provide the capability to identify, locate, and monitor <u>individuals</u> ? If yes, explain.	Yes, The data can be used by NRCS NPDC to contact an individual to verify information provided to the Plant DU. However the data entered by the individual is not necessarily accurate.
4b. Will this system provide the capability to identify, locate, and monitor <u>groups of people</u> ? If yes, explain.	No
4c. What controls will be used to prevent unauthorized monitoring?	The Plants DU application is in the process of undergoing a Security Certification and Accreditation process that will identify the risks to unauthorized use and implement at plan to mitigate the risks where possible.
5a. Under which Systems of Record notice (SOR) does the system operate? Provide number and name.	Notice of Privacy Act System of Records by Owner, Operator or Producer Files (or Volunteer / Employee Files) USDA/NRCS-1
5b. If the system is being modified, will the	NA

SOR require amendment or revision? Explain.	
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